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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN LEE SMITH, Jr.,

Defendant.

)
) 2:16-CR-00050-RFB Lead Case
) 2:09-CR-00487-LDG Member Case
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JOINT MOTION TO CONSOLIDATE

The United States, by Daniel G. Bogden, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, and Brian Pugh, and Brenda Weksler, Assistant Federal Public Defenders, both counsel for defendant Jonathan Lee Smith, Jr., jointly move the Court to consolidate the above-captioned cases under a single case number, preferably 2:16-CR-00050-RFB, as set forth below:

1. On December 16, 2016 the defendant was arrested on a warrant issued by this Court following the government's filing of a complaint alleging multiple counts of bank robbery. At the time of the alleged offenses, the defendant was serving a period of supervised release. Among the conditions imposed was that he "not commit another Federal, State or local crime during the term of supervision." A revocation hearing for the allegations of violation of supervised release is currently set for March 10, 2016.

2. The parties negotiated a pre-indictment plea agreement, which seeks to resolve both the new charges and the alleged violations of conditions of supervised release as part of a “global resolution.” On February 25, 2016, the defendant appeared before United States District Judge Richard F. Boulware, II and entered a plea of guilty in accordance with his plea agreement. The Court set sentencing for May 25, 2016.

3. Because the plea agreement includes a proposed resolution to both the bank robberies and the alleged violations of conditions of supervised release, and both arise out of the same conduct, the parties respectfully request that the Court enter an Order consolidating these two cases under 2:16-CR-00050-RFB.

DATED this 26th day of February, 2016.

Respectfully submitted,
DANIEL G. BOGDEN
United States Attorney

/s/

/s/

BRIAN PUGH
Assistant Federal Public Defender
Counsel for Defendant Smith
2:16-CR-00050-RFB

JARED L. GRIMMER
Assistant United States Attorney

/s/

BRENDA WEKSLER
Assistant Federal Public Defender
Counsel for Defendant Smith
2:09-CR-00487-LDG-LRL

So Ordered:


United States District Judge

Lloyd D. George


Date



RICHARD F. BOULWARE, II
United States District Judge

DATED this 4th day of March, 2016.